

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

PEDRO RAMIREZ, JR., Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

VS.

EXXON MOBIL CORPORATION, et al.,

Defendants.

Civil Action No. 3:16-cv-03111-K

CLASS ACTION

**GREATER PENNSYLVANIA CARPENTERS PENSION FUND'S MOTION FOR
APPOINTMENT AS LEAD PLAINTIFF AND FOR APPROVAL OF SELECTION OF
LEAD COUNSEL**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Greater Pennsylvania Carpenters Pension Fund (the “Pension Fund”) will and hereby does move this Court on a date and at such time as may be designated by the Court, for an order: (i) appointing the Pension Fund as lead plaintiff pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. §78u-4; and (ii) approving the Pension Fund’s selection of Robbins Geller Rudman & Dowd LLP as lead counsel for the class.¹ In support of this Motion, the Pension Fund submits the accompanying Memorandum of Law, an Appendix of Exhibits and a [Proposed] Order.

DATED: January 6, 2017

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¹ Civil Local Rule 7.1.a. requires motions to be accompanied by a Certificate of Conference indicating that the attorney for the moving party has conferred with the attorneys for each party affected by the requested relief to determine whether the motion is opposed. Civil Local Rule 7.1.b.3. mandates that, if a conference is not held, the certificate explain why it was not possible to confer. The Pension Fund respectfully submits that it is not possible to confer here because the Pension Fund cannot ascertain the identity of the parties moving for appointment as lead plaintiff until after all such motions have been filed. *See* 15 U.S.C. §78u-4(a)(3) (allowing any class member to file a lead plaintiff motion within 60 days of publication of early notice). Under these circumstances, the Pension Fund respectfully requests that the conferral requirement of Local Rule 7.1.a. be waived for the limited purposes of this Motion.

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